



Littler Mendelson, PC
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February 19, 2021

VIA ECF

Honorable Philip M. Halpern
United States District Judge
Southern District of New York
500 Pearl Street,
New York, New York 10007

Application granted. Deadline to complete discovery extended to 4/26/2021. The case management conference scheduled for 3/1/2021 will proceed as a status conference, and will be held by telephone: (888) 398-2342; access code 3456831.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 22, 2021

Re: *Kelly v. The City of Mount Vernon, et al.*
Case No. 7:19-cv-11369 (PMH)

Dear Judge Halpern:

This firm represents Defendant Richard Thomas, former Mayor of the City of Mount Vernon (the "City"), in the above-captioned action. Pursuant to Rule 1(C) of the Court's Individual Rules and Practices, we write on behalf of the parties to respectfully request a two-month extension of the close of fact discovery, from February 26, until April 26, 2021. This is the parties' second request for an extension. The parties' first request for an extension was granted on December 17, 2020. See Order, Dkt. No. 129.

Additionally, in support of their request, the parties respectfully request a status conference to provide the Court with a detailed overview of their remaining paper discovery, deficiencies in written discovery responses, and outstanding party and non-party depositions. Given that the parties are scheduled to appear for a Case Management Conference on March 1, 2021, the parties can discuss the status of discovery at that time.

Thank you for your time and consideration of our request.

Respectfully submitted,

Littler Mendelson, P.C.

/s/ Daniel Gomez-Sanchez

Daniel Gomez-Sanchez
Shirley W. Bi

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cc: Robert Kelly (Via ECF)
Plaintiff *Pro Se*

Julie Pechersky Plitt (Via ECF)
Oxman Law Group, PLLC
Attorneys for the City

4832-3828-8093.3